pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**NORTHCENTRAL REGIONAL OFFICE**
**CLEAN WATER PROGRAM**

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| Application Type | **Renewal** | Application No. | **PA0027057** |
| Facility Type | **Sewage** | APS ID | **709525** |
| Major / Minor | **Major** | Authorization ID | **941708** |

# NPDES PERMIT FACT SHEET ADDENDUM No. 4

## Applicant and Facility Information

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|---|---|---|---|
| Applicant Name | **Williamsport Sanitary Authority** | Facility Name | **Central Plant** |
| Applicant Address | 253 W 4th Street | Facility Address | 601 E Jefferson Lane |
| | Williamsport, PA 17701-6113 | | Williamsport, PA 17701-5340 |
| Applicant Contact | Wendy Walter | Facility Contact | Steve Benner |
| Applicant Phone | (570) 323-6140 | Facility Phone | (570) 323-6140 |
| Client ID | 70278 | Site ID | 261565 |
| SIC Code | 4952 | Municipality | City of Williamsport |
| SIC Description | Trans. & Utilities - Sewerage Systems | County | Lycoming |
| Date Published in PA Bulletin | May 2, 2015 | EPA Waived? | No |
| Comment Period End Date | May 31, 2015 | If No, Reason | Major Facility, Significant CB Discharge, Pretreatment, Receives O&G Wastewater |
| Purpose of Application | Application for a renewal of an NPDES permit for discharge of treated Sewage. | | |

## Internal Review and Recommendations

Williamsport Sanitary Authority (WSA) submitted comments dated May 28, 2014. The comments and DEP responses are as follows:

1. **Comment:** **TRC Limit, page 2** – The WSA has reviewed the historical TRC files and is attaching a summary of the site specific study conducted in 1997 – 1998 including the biweekly data sheets. Based on the data, the WSA requests that the TRC Evaluation Calculation run using the data obtained from the study: 0.3 mg/L for the chlorine demand of the stream and 0.2 mg/L for the chlorine demand of the discharge.

   **Response:** DEP has incorporated the 1998 chlorine demand study into the TRC_CALC spreadsheet. The result is an increase from the average monthly water quality-based effluent limitation of 0.21 to 0.30 mg/L and instantaneous maximum of 0.71 to 1.01 mg/L.

   Additionally, since the 1998 chlorine demand study is nearly 20 years old, a requirement has been proposed in Part C of the permit for WSA to conduct a new site-specific study and provide the results with the subsequent permit renewal application if they wish to continue the use of site specific data in developing TRC effluent limitations.

2. **Comment:** **Instant Maximum, page 4** – The following footnote from the 2008 permit has been removed.

   "The Instantaneous Maximum Discharge limitations are for compliance use by DEP only. Do not report instantaneous maximums on DMRs or supplemental DMRs unless specifically required on those forms to do so."

   The WSA requests that it be re-inserted or explanation provided for the change in reporting requirement.

   **Response:** WSA is only required to report the effluent limits identified on the DMRs. If an instantaneous maximum

| Approve | Return | Deny | Signatures | Date |
|---|---|---|---|---|
| | | | Derek S. Garner / Project Manager | February 12, 2015 |
| | | | Jeremiah W. Northridge, P.E. / Environmental Engineer Manager | |
| | | | Thomas M. Randis / Program Manager | |

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(IMAX) limitation is identified in Part A of the permit, but not on the DMR than WSA is not required to report the IMAX. In this case, it would be used for compliance purposes by DEP during site inspections.

3. **Comment:** **Test Procedures, page 10** – The language in the draft permit specifically approves alternate procedures. Please confirm that Alternate Test Procedures which are approved in accordance with 40 CFR 136 are acceptable to use for analyses for DMR reporting purposes. The WSA currently analyzes fecal coliform by the Colilert 18/Quantitray method and Nitrate-Nitrite by Hach Method 10206 which are alternate test procedures that have been approved by the DEP Bureau of Laboratories and are listed on our Scope of Accreditation.

   **Response:** Alternate Test Procedures which are approved in accordance with 40 CFR 136 are acceptable to use for analyses for DMR reporting purposes.

4. **Comment:** **Total Mass Load, page 21** – The conversion factor in the definition of Total Mass Load has been changed from 8.34 to 8.345. This is inconsistent with Instructions for Completing DMR Supplemental Reports, Page 5, Nutrient Monitoring Report, which specifically uses a conversion of 8.34. Increasing the conversion factor by 0.005 increases the WSA nutrient mass requirement by 92 pounds per year which no basis for the change. The WSA requests that the standard 8.34 conversion factor be required for this calculation.

   **Response:** WSA should use 8.34 when calculating Total Mass Load. All necessary corrections to the permit have been made.

Additional comments from WSA were received via email dated June 17, 2015. The comment requested Total Nitrogen Offsets from the addition of 5 EDUs that were previously connected to on-lot septic systems. The 5 EDUs were previously served by two on-lot systems constructed in 1978 and 1993. In accordance with Pennsylvania's Chesapeake Bay Watershed Implementation Plan, since these on-lot sewage disposal systems were connected to the public sewer system after January 1, 2003, the permit will include 25 lbs/year of Total Nitrogen Offsets per EDU, or 125 lbs/yr.

Comments by EPA were provided via email dated May 29, 2015 regarding the permit's CSO and pretreatment requirements. Specifically, the comments requested the inclusion of additional CSO requirements. Since WSA is already implementing or achieving the requirements suggested by EPA they have been included in the permit as follows:

In response to EPA's comment, DEP is proposing the following CSO language be added to the permit:

A. The permittee shall not discharge any pollutant at a level that causes or contributes to an in-stream excursion above numeric or narrative criteria adopted as part of Pennsylvania's water quality standards.

B. The permittee shall comply with the following performance standards. These standards shall apply during design conditions developed using National Oceanic and Atmospheric Administration (NOAA)'s Climatography of the United States No. 81, Monthly Station Normals of Temperature, Precipitation and Heating and Cooling Degree Days data as outlined in permittee's long term control plan.

   1. The permittee shall eliminate or capture for treatment, or storage and subsequent treatment, at least 85% of the system-wide combined sewage volume collected in the combined sewer system during precipitation events under design conditions. Captured combined sewage shall receive the treatment specified below.

      Any combined sewage captured shall receive a minimum of the following treatment:

      a. Primary clarification or equivalent.
      b. Solids and floatables disposal.
      c. Disinfection. Fecal coliform counts shall be maintained below a geometric mean of 200 per 100 ml during swimming season (May 1 through September 30) and below a geometric mean of 2,000 per 100 ml during the remainder of the year.

Regarding the Headworks Analysis language in Part C V.E. of the permit, EPA has proposed the following edits:

E. Headworks Analysis – The permittee shall submit to EPA a reevaluation of its local limits based on a headworks analysis of its treatment plant within one (1) year of permit issuance, and provide a revised submission within three

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(3) months of receipt of comments from EPA unless a longer period of time is granted in writing by EPA. In order to ensure that the permittee's discharge complies with water quality standards, the reevaluation of local limits shall consider, at a minimum, all water quality standards under 25 Pa. Code Chapter 93 applicable to the pollutants included in the reevaluation, unless the POTW is subject to an effluent limitation for the pollutant in Part A of this permit. The list of pollutants to be evaluated, as well as a sampling plan for collection of necessary data, shall be submitted to EPA within three (3) months of permit issuance. Unless otherwise approved in writing, the list of pollutants shall include arsenic, cadmium, chromium, copper, cyanide, lead, mercury, molybdenum, nickel, selenium, silver, zinc, $BOD_5$, TSS, ammonia, any pollutants for which a local limit currently exists, any pollutant limited in this permit, as well as any other pollutants that have been identified in the POTW in significant quantities through monitoring or the receipt of indirect discharges and hauled-in wastes. Based on knowledge of this facility, the sampling plan shall also ~~For example, facilities receiving residual waste from oil and gas operations should~~ include pollutants such as Total Dissolved Solids (TDS), specific ions such as chlorides and sulfates, specific radionuclides, metals such as barium and strontium, and other pollutants that could reasonably be expected to be present at a facility that accepts waste from Marcellus shale operations. Within four (4) months of acceptance of the headworks analysis by the Approval Authority, the permittee shall adopt the revised local limits and, if necessary to ensure that the limits are enforceable throughout the service area, notify all contributing municipalities of the need to adopt the revised local limits.

DEP does not believe the above changes to the existing condition are warranted. WSA does not directly accept wastewater generated from Marcellus shale operations; instead, the water is treated (distilled) at a centralized waste treatment (CWT) facility before being discharged into the sewer. Testing for Total Dissolved Solids and its main constituents at WSA will most likely not lead to any meaningful results as the pollutants would have already been removed during the distillation process. It is proposed that the existing Headworks Analysis condition remain unchanged.

Based on changes to TRC limits and CSO language, it is recommended that the permit be redrafted and published in the PA Bulletin for a thirty day public commenting period.